

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

In re Felicia D. Allen,)	
)	Case No. 17-30971-SVK
Debtor.)	Chapter 13

MOTION TO IMPOSE AUTOMATIC STAY

Felicia D. Allen (“Debtor”), through her counsel, Michael J. Watton and the Watton Law Group, hereby moves under 11 U.S.C. § 362(c)(3)(B) that this Court enter an order imposing an automatic stay and in support thereof alleges the following:

1. That Debtor has had two previous case under Title 11 dismissed within 1 year of the filing of this present Chapter 13 bankruptcy;
2. That since the dismissal of the previous bankruptcy, there has been a substantial change in the personal and financial affairs of Debtor in that her previous case, 14-26249, was dismissed because she was not able to afford the increase in plan payments. Acting on the advice of her previous counsel, she voluntarily dismissed my case. She refiled a case on May 1, 2017, case number 17-24216. Her previous counsel informed her that there was a motion to dismiss filed in her last case because she did not provide her tax returns. She furnished her tax returns to her counsel and she thought the motion to dismiss was resolved. Her previous counsel did not explain that the Motion to Dismiss was also for failure to make plan payments. Debtor incorrectly assumed that her plan payments were being deducted her paychecks. Her previous counsel did not inform her that the payments were not being sent to the Trustee from her payroll. In the present case, Debtor has

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hired new counsel to represent her. Additionally, she understands the requirement of making all plan payments on time or her case will be dismissed.

WHEREFORE, Debtor requests that the Court schedule a hearing on this motion within 30 days of the filing of this present Chapter 13 bankruptcy and issue an order imposing an automatic stay as to all creditors.

Date: November 10, 2017

/s/ Timothy H. Hassell (for)
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